

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas

UNITED STATES DISTRICT COURT

NOV 18 2018

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Karen Liset RODRIGUEZ
YOB: 1995 USCCase No. M-18-2367-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 18, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

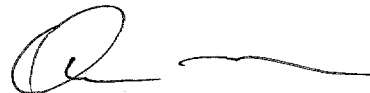
21 USC § 952
21 USC § 841

Offense Description

Knowingly and intentionally import into the United States from the United Mexican States approximately 4.3 kilograms of methamphetamine and 1.24 kilograms of cocaine, both Schedule II controlled substances, and did knowingly and intentionally possess with the intent to distribute approximately 4.3 kilograms of methamphetamine and 1.24 kilograms of cocaine, both Schedule II controlled substances.

This criminal complaint is based on these facts:

See "Attachment A"

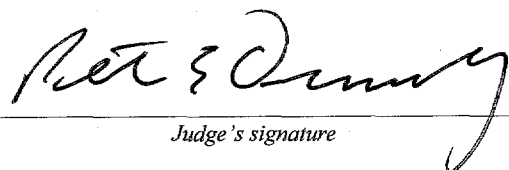
☒ Continued on the attached sheet.

Complainant's signature

Quintin R Moses / Special Agent HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 11/18/20184:17 pm

Judge's signature

City and state: McAllen, TX

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On November 18, 2018, Karen Liset RODRIGUEZ (USC) applied for admission into the United States (US) from Mexico at the US Customs and Border Protection (CBP) Hidalgo Port of Entry (POE) operating a white 2012 Dodge Caravan, bearing TX license plate KPF0498. During a primary inspection with CBP, RODRIGUEZ presented her Texas driver's license and stated she had a US Passport. The primary CBP Officer (CBPO) asked RODRIGUEZ if she had any merchandise to declare, to include, fruit, food, medication, meats, plants, liquor, tobacco, ammunition, illicit narcotics, and/or US Currency exceeding ten thousand dollars (\$10,000.00). RODRIGUEZ provided a negative oral declaration.

During the encounter between the CBPO and RODRIGUEZ, RODRIGUEZ stated she was returning to the US from Reynosa, Tamaulipas, Mexico, where she visited family. RODRIGUEZ stated she was traveling to Houston, TX, where she resided. RODRIGUEZ stated she was the owner of the aforementioned white Dodge Caravan, having purchased the vehicle approximately one (1) to two (2) months preceding said encounter. CBPO Lopez referred RODRIGUEZ for a secondary inspection.

During a secondary inspection, RODRIGUEZ provided a second negative oral declaration to CBPOs. In secondary, RODRIGUEZ stated she traveled to Monterrey, Mexico to visit family and to purchase items for a birthday party scheduled for a family member of RODRIGUEZ. A CBP K9 "ROX - 150161 inspected RODRIGUEZ's Dodge Caravan. During the inspection, ROX alerted to the presence of the odor of illicit narcotics near the center console of the Dodge Caravan.

CBPOs utilized a Z-Portal to conduct an X-Ray scan of the Dodge Caravan. A scan of the vehicle revealed foreign anomalies within the interior of the dashboard. A subsequent search of the Dodge Caravan yielded in the discovery and seizure of eight (8) cellophane wrapped packages that contained a crystal substance consistent with methamphetamine and one (1) cellophane wrapped package that contained a white powdery substance consistent with cocaine. The eight (8) packages that contained the crystal substance weighed four point three (4.3) kilograms. A field analysis of the crystal substance yielded a positive result for the presence of methamphetamine. The one (1) package that contained the white powdery substance weighed one point two four (1.24) kilograms. A field analysis of the white powdery substance yielded a positive result for the presence of cocaine.

Homeland Security Investigations, McAllen TX (HSI McAllen) Special Agent (SA) Quintin Moses and SA Joe Mike Salinas responded to the POE Hidalgo to conduct an investigation.

During the interview, RODRIGUEZ admitted an unknown person requested she travel to Monterrey, retrieve unknown illegal items, transport said illegal items in the Dodge Caravan, and introduce said illegal items into the US from Mexico. RODRIGUEZ stated she was merely hired as a driver and was unaware of what type of illegal items she transported. RODRIGUEZ stated she was scheduled to be compensated four thousand dollars (\$4,000.00) in US Currency if she successfully transported the illegal items to Houston from Mexico. RODRIGUEZ stated she knowingly introduced some type of illegal item into the US and further stated the illegal items could have potentially been firearms.

ATTACHMENT A

Based on the facts of the investigation, probable cause exists to believe Karen Liset RODRIGUEZ intentionally and knowingly unlawfully imported a controlled substance (methamphetamine and cocaine) into the United States in violation of 21 USC § 952 – Importation of Controlled Substances and intentionally and knowingly unlawfully possessed a controlled substance (methamphetamine and cocaine) with intent to distribute in violation 21 USC § 841 – Possession with Intent to Distribute a Controlled Substance.